

EXHIBIT B
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To Be Filed Under Seal

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION
3
4 ATARI INTERACTIVE, INC.,)
5 Plaintiff,)
6 v.) Case No.
7 REDBUBBLE, INC.,) 4:18-cv-03451-JST
8 Defendant.)
9
10 AND RELATED ACTIONS)
11)

14 CONFIDENTIAL DEPOSITION OF ARNAUD DESHAIS
15 San Francisco, California
16 Tuesday, December 10, 2019
17 Volume I

21 Reported by:
22 CHRIS TE SELLE
23 CSR No. 10836
24 Job No. 3795818
25 PAGES 1 - 118

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

ATARI INTERACTIVE, INC.,)

Plaintiff,)

v.) Case No. _____

REDBUBBLE, INC.,) 4:18-cv-03451-JST

Defendant.)

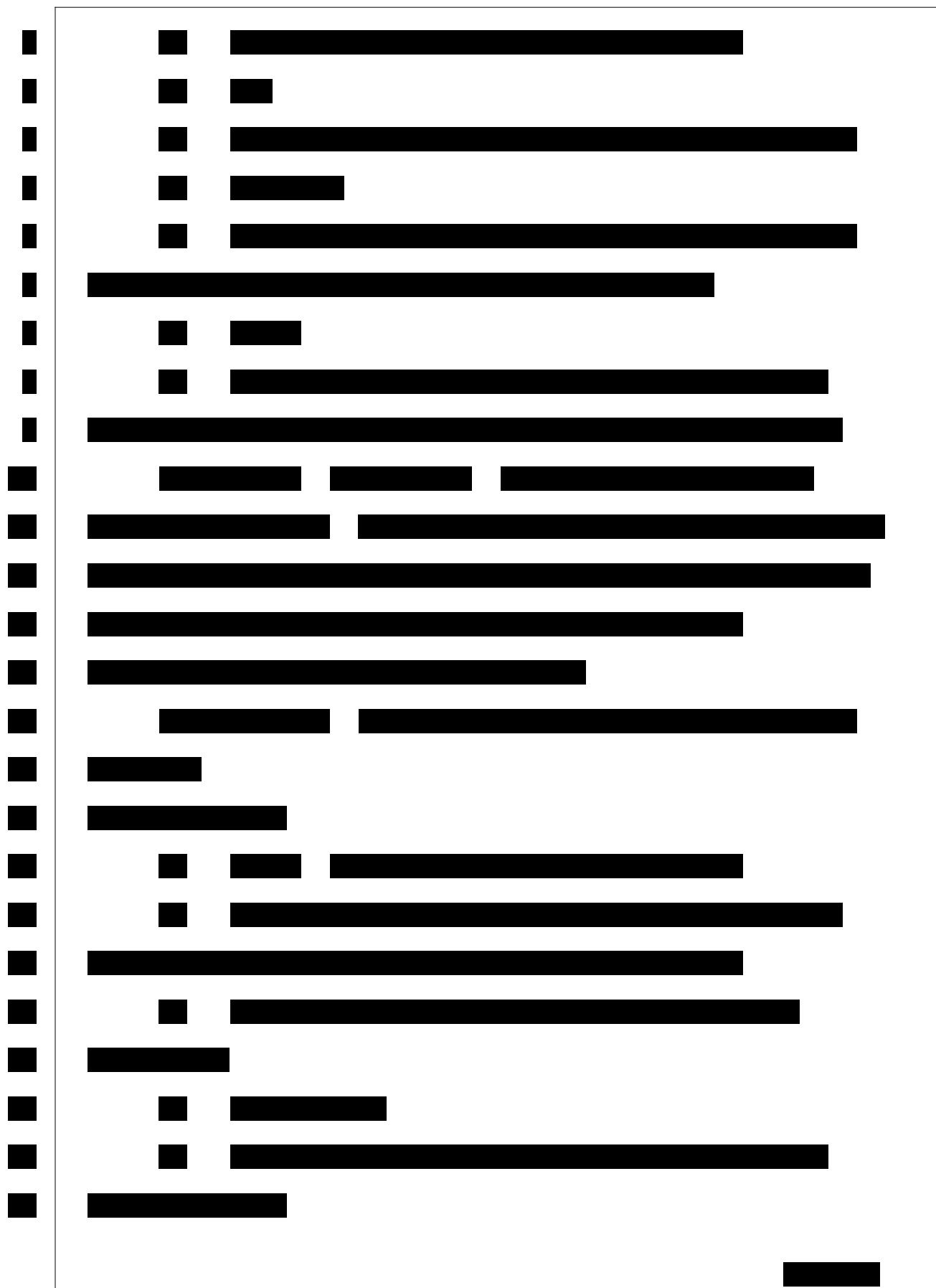
AND RELATED ACTIONS)

Confidential Deposition of ARNAUD DESHAIS

Volume I, at the offices of Brown George Ross LLP, 44
Montgomery Street, Suite 1280, San Francisco,
California, beginning at 10:33 a.m. and ending at 2:44
p.m., on Tuesday, December 10, 2019, before Chris
Te Selle, Certified Shorthand Reporter No. 10836.

1

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The figure consists of a series of 20 horizontal black bars of varying lengths, arranged vertically. Each bar is preceded by a vertical black bar on the left. The lengths of the bars decrease from top to bottom. The first bar is the longest, followed by a shorter bar, then a longer bar, and so on, with the last bar being the shortest. The vertical bars on the left are evenly spaced, and the horizontal bars are also evenly spaced.

A 20x20 grid of black bars. The bars are arranged in a pattern where most are horizontal, but some are vertical or shorter horizontal segments. The grid is bounded by a thick black border.

This figure is a horizontal bar chart featuring 20 distinct data series. Each series is depicted as a thick black bar. The bars are arranged vertically, with their heights and widths varying to represent different data values. A light gray vertical grid line is positioned on the left side of the chart, providing a reference for the bar heights.

The figure consists of a 20x20 grid of black bars. The bars are primarily horizontal, with lengths varying from approximately 10 to 20 units. There are several vertical gaps of varying widths. In the first few rows, there are small black squares at the start of the horizontal bars. As the grid progresses, these squares appear less frequently, and the horizontal bars become longer and more continuous. The overall pattern suggests a transition from a more segmented to a more integrated structure.

A 20x20 grid of black bars on a white background. The bars are arranged in a pattern where most are horizontal, but some are vertical or form small clusters. The grid is bounded by a thick black border.

The figure consists of a 20x20 grid of black bars. The bars are either very short (approximately 1 pixel high) or very long (approximately 18 pixels high). The pattern repeats every 4 rows. The first 4 rows have bars of length 1, 3, 10, and 1 respectively. The next 4 rows have bars of length 10, 1, 3, and 1 respectively. This pattern continues for all 20 rows.

The figure consists of a 20x20 grid of black bars on a white background. The bars are of varying lengths and are arranged in a pattern that is mostly horizontal. There are several vertical bars and some small clusters of bars. The grid is bounded by a thick black border.

A horizontal bar chart with 15 categories on the left and 65 items on the right. The categories are represented by vertical dashed lines. The items are represented by horizontal bars. The bars are black and vary in length. Some categories have multiple bars, while others have none. The total number of bars is 65.

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A large number of horizontal black bars of varying lengths, likely representing redacted text or data. The bars are arranged in a grid-like pattern, with some bars being significantly longer than others, suggesting a list or a table where some entries are much larger than others. The bars are set against a white background.

A large grid of black redaction bars and small black squares. The grid consists of 12 rows and 10 columns. The first column contains 12 small black squares. The second column contains 12 horizontal redaction bars. The third column contains 12 small black squares. The fourth column contains 12 horizontal redaction bars. The fifth column contains 12 small black squares. The sixth column contains 12 horizontal redaction bars. The seventh column contains 12 small black squares. The eighth column contains 12 horizontal redaction bars. The ninth column contains 12 small black squares. The tenth column contains 12 horizontal redaction bars.

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1 I, ARNAUD DESHAIS, do hereby declare under penalty
2 of perjury that I have read the foregoing transcript,
3 volume I; that I have made any corrections as appear
4 noted, in ink, initialed by me; that my testimony as
5 contained herein, as corrected, is true and correct.

6 EXECUTED this 02 day of February,
7 2020, at SAN FRANCISCO, CALIFORNIA.

8 (City)

(State)



13 ARNAUD DESHAIS

14 VOLUME I

1 I, the undersigned, a Certified Shorthand Reporter
2 of the State of California, do hereby certify:

3 That the foregoing proceedings were taken before me
4 at the time and place herein set forth; that any
5 witnesses in the foregoing proceedings, prior to
6 testifying, were duly sworn; that a record of the
7 proceedings was made by me using machine shorthand which
8 was thereafter transcribed under my direction; that the
9 foregoing transcript is a true record of the testimony
10 given.

11 Further, that if the foregoing pertains to the
12 original transcript of a deposition in a Federal Case,
13 before completion of the proceedings, review of the
14 transcript [] was [] was not requested.

15 I further certify I am neither financially
16 interested in the action nor a relative or employee of
17 any attorney or party to this action.

18 IN WITNESS WHEREOF, I have this date subscribed my
19 name.

20 Dated: December 26, 2019

21
22 Chris Te Selle
23

24 CHRIS TE SELLE

25 CSR No. 10836

DESHAIS EXH. 1068

7/24/2018

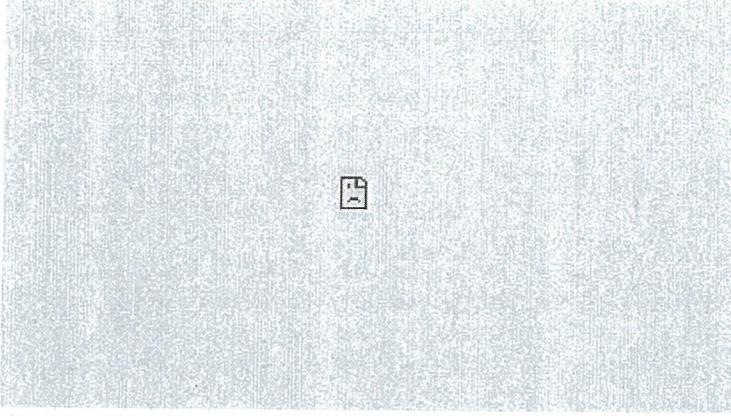
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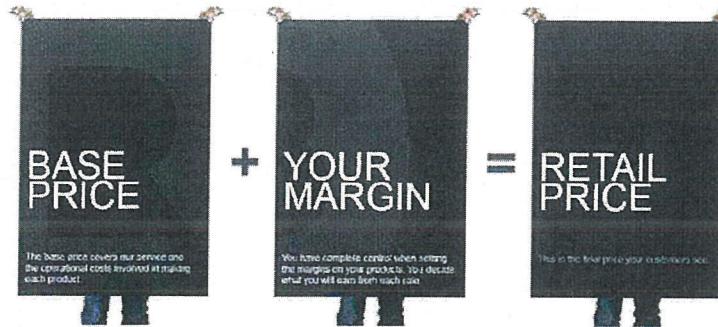
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